

# EXHIBIT “A”

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FIRST JUDICIAL CIRCUIT
COUNTY OF ORANGEBURG	)	C/A NO. 2018-CP-38-_____
Edwina C. Fersner,	)	
	)	
Plaintiff,	)	
	)	
-vs-	)	<b>SUMMONS</b>
	)	(Jury trial demanded)
Laquandra Sondreater Hamilton,	)	
	)	
Defendant.	)	

**TO: DEFENDANT ABOVE-NAMED:**

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, of which a copy is herewith served upon you, and to serve a copy of your Answer to the said Complaint on the subscriber at 1281 Russell Street (29115), Post Office Box 1084, Orangeburg, South Carolina 29116 within thirty (30) days after the service hereof, exclusive of the day of such service; and if you fail to answer the Complaint within the time aforesaid, the Plaintiff in this action will apply to the Court for the relief demanded in the Complaint and judgment by default will be rendered against you for the relief demanded in the Complaint.

s/David R. Williams  
David R. Williams, 77899  
Virginia W. Williams, 77898  
WILLIAMS & WILLIAMS  
1281 Russell Street (29115)  
Post Office Box 1084  
Orangeburg, S.C. 29116  
Tel: (803) 534-5218  
Fax: (803) 536-6298  
Email: [williamsdr@williamsattys.com](mailto:williamsdr@williamsattys.com)  
[williamsvw@williamsattys.com](mailto:williamsvw@williamsattys.com)  
ATTORNEYS FOR PLAINTIFF

November 28, 2018  
Orangeburg, South Carolina

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FIRST JUDICIAL CIRCUIT
COUNTY OF ORANGEBURG	)	C/A NO. 2018-CP-38-_____
Edwina C. Fersner,	)	
	)	
Plaintiff,	)	
	)	
-vs-	)	<b><u>COMPLAINT</u></b>
	)	(Jury trial demanded)
Laquandra Sondreater Hamilton,	)	
	)	
Defendant.	)	
_____	)	

Plaintiff, above-named, complaining of Defendant herein, would allege:

1. Plaintiff is a citizen and resident of the County of Orangeburg, State of South Carolina.
2. Upon information and belief, Defendant Laquandra Sondreater Hamilton is a citizen and resident of the County of Orangeburg, State of South Carolina, and at the time the occurrence herein mentioned was the driver of a 2015 Toyota sedan.
3. Venue is proper in Orangeburg County, South Carolina.
4. On or about December 5, 2015, Plaintiff was traveling on Broughton Street, Orangeburg, South Carolina, towards Murray Road. As Plaintiff attempted to turn right onto George Patton Street, Defendant, who was traveling too close and too fast for conditions, suddenly and without warning slammed into the passenger side of Plaintiff's vehicle which then caused Plaintiff to collide head on with another vehicle that was stopped at the stop sign on George Patton Street.
5. As a result of Defendant's negligence, recklessness, carelessness, willfulness, wantonness, and gross negligence, Plaintiff received serious and permanent injuries resulting in medical care, medical expenses, severe excruciating pain, and serious, permanent injuries which have and will in the future cause each to endure great physical

pain, suffering, mental anguish, emotional distress, and ultimately cause Plaintiff to incur future medical bills and wage loss.

**FOR A FIRST CAUSE OF ACTION**  
**(Negligence/Negligence per Se)**

6. Plaintiff re-alleges and reiterates the allegations set forth in the previous paragraphs as if set out herein verbatim.
7. At the time and place mentioned above, Defendant Hamilton was negligent, reckless, willful and wanton, in one or more of the following particulars, to wit:
  - a. In failing to maintain a proper lookout;
  - b. In failing to keep proper control of her vehicle;
  - c. In driving too fast for conditions;
  - d. In failing to yield the right of way;
  - e. In failing to exercise the degree of care that a reasonably prudent person would have exercised under the same or similar circumstances;
  - f. In such other and further particulars that the evidence in trial may show.
8. By reason and in consequence of Defendant's conduct, Plaintiff has sustained severe and permanent injuries to various parts of her body and these injuries were of such a nature so as to require them to expend monies, seek doctors' care, and incur other medical necessities. Plaintiff has suffered and will continue to suffer great pain, humiliation and mental anguish.
9. All of which combined and concurred as a direct and proximate cause of the injuries and damages sustained by Plaintiff herein, said acts being in violation of the statutes and laws of the State of South Carolina.
10. Plaintiff is informed and believes that she is entitled to actual damages in an amount

which would adequately compensate her for her injuries and damages as well as for reasonable punitive damages as may be determined by the trier in fact.

WHEREFORE, Plaintiff prays for judgment against Defendant for actual damages and for punitive damages as may be determined by the trier of fact, the cost of this action and for such other and further relief as this Court may deem just and proper.

s/David R. Williams

David R. Williams, 77899

Virginia W. Williams, 77898

WILLIAMS & WILLIAMS

1281 Russell Street (29115)

Post Office Box 1084

Orangeburg, S.C. 29116

Tel: (803) 534-5218

Fax: (803) 536-6298

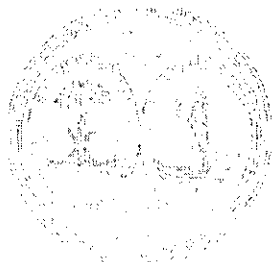
Email: [williamsdr@williamsattys.com](mailto:williamsdr@williamsattys.com)

[williamsvw@williamsattys.com](mailto:williamsvw@williamsattys.com)

ATTORNEYS FOR PLAINTIFF

November 28, 2018

Orangeburg, South Carolina



# South Carolina Department of Insurance

Capitol Center  
1201 Main Street, Suite 1000  
Columbia, South Carolina 29201

Mailing Address:  
P.O. Box 100105, Columbia, S.C. 29202-3105  
Telephone: (803) 737-6160

December 4, 2018

HENRY McMASTER  
Governor

RAYMOND G. FARMER  
Director

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
OWNERS INSURANCE CO  
c/o CT Corporation System  
2 Office Park Court, Suite 103  
Columbia, SC 29223-0000

Dear Sir:

On December 4, 2018, I accepted service of the attached Summons and Complaint on your behalf. I am, hereby, forwarding that accepted process on to you pursuant to the provisions of S.C. Code Ann. § 38-5-70. By forwarding accepted process on to you, I am meeting a ministerial duty imposed upon me by S.C. Code Ann. § 38-77-160. I am not a party to this case. The State of South Carolina Department of Insurance is not a party to this case. It is important for you to realize that service was effected upon your insurer on my date of acceptance for service.

You must promptly acknowledge in writing your receipt of this accepted process to [sdubois@doi.sc.gov](mailto:sdubois@doi.sc.gov). When replying, please refer to File Number 172871, Edwina C. Fersner v. Laquandra S Hamilton, 2018-CP-38-01493.

By:

*David E. Belton*

David E. Belton  
Senior Associate General Counsel  
(803)737-6132

Sincerely Yours,

Raymond G. Farmer  
Director  
State of South Carolina  
Department of Insurance

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p>Director of Insurance South Carolina Department of Insurance LEGAL DEPARTMENT (Service of Process) P.O. Box 100105 Columbia, SC 29202-3105</p> <p>9590 9402 3325 7227 4325 41</p> <p>7016 3560 0000 2993 3226</p>		<p>A. Signature</p> <p><b>X</b> Mike Gray <input type="checkbox"/> Agent <input type="checkbox"/> Address</p> <p>B. Received by (Printed Name) C. Date of Delivery</p> <p>delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No YES, enter delivery address below:</p> <p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery</p> <p>Insured Mail over \$500</p>	
<p>PS Form 3811, July 2015 PSN 7530-02-000-9053</p>		<p>Domestic Return Receipt</p>	

ELECTRONICALLY FILED - 2018 Dec 11 10:40 AM - ORANGEBURG - COMMON PLEAS - CASE#2018CP3801493

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STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	:	FOR THE FIRST JUDICIAL CIRCUIT
COUNTY OF ORANGEBURG	)	CIVIL ACTION NO.: 2018-CP-38-01493
EDWINA C. FERSNER,	)	
	)	
Plaintiff,	)	<b>NOTICE OF APPEARANCE AND</b>
	)	<b>CONDITIONAL ANSWER OF</b>
vs.	)	<b>AUTO-OWNERS INSURANCE</b>
	)	<b>COMPANY</b>
LAQUANDRA SONDREATER	)	
HAMILTON,	)	
	)	
Defendant.	)	

---

PLEASE TAKE NOTICE that the undersigned hereby appear on behalf of Auto-Owners Insurance Company ("Auto-Owners") in this action and further give notice that Auto-Owners will provide a defense to the alleged at-fault Defendant if necessary to protect Auto-Owners' interests under the terms and conditions of the policy issued by Auto-Owners to Edwina C. Fersner. Auto-Owners specifically reserves and does not waive any and all terms and conditions of the policy. Auto-Owners specifically demands a trial by jury. The undersigned further state that they do not represent the Defendant but are specifically reserving the option to assume control of the defense in the name of the Defendant pursuant to the underinsured motorist statute.

This appearance is made pursuant to S.C. Code Ann. § 38-77-160. To the extent a responsive pleading is required, the allegations in the Complaint are denied. Auto-Owners further asserts the affirmative defenses set forth in Rule 8 of the South Carolina Rules of Civil Procedure and the defenses set forth in Rule 12 of the South Carolina Rules of Civil Procedure, all to the extent they are applicable.

The undersigned further reserves the right to file a full answer at such time as it may assume the defense in this matter or thereafter.

By filing this Notice of Appearance and Conditional Answer, Auto-Owners makes no representations or admissions as to the existence, applicability, or amount of any insurance coverage.

Dated this 17<sup>th</sup> day of December, 2018.

Respectfully submitted,

WALL TEMPLETON & HALDRUP, P.A.

s/ Morgan S. Templeton

Morgan S. Templeton (SC Bar #15456)

John J. Dodds, IV (SC Bar #102690)

145 King Street, Suite 300 (29401)

Post Office Box 1200

Charleston, South Carolina 29402

(843) 329-9500

Morgan.Templeton@walltempleton.com

John.Dodds@walltempleton.com

Attorneys for Auto-Owners Insurance  
Company



## Certificate of Electronic Notification

### Recipients

**David Williams** - Notification transmitted on 12-17-2018 08:32:57 AM.

**Virginia Williams** - Notification transmitted on 12-17-2018 08:32:57 AM.

\*\*\*\*\* IMPORTANT NOTICE - READ THIS INFORMATION \*\*\*\*\*  
NOTICE OF ELECTRONIC FILING [NEF]

-

**A filing has been submitted to the court RE: 2018CP3801493**

**Official File Stamp:** 12-17-2018 08:32:47 AM

**Court:** CIRCUIT COURT

Common Pleas

Orangenburg

**Case Caption:** Edwina C Fersner VS Laquandra Sondreater  
Hamilton

**Event(s):**

Add Party to Case

**Document(s) Submitted:** Answer/Answer

**Filed by or on behalf of:** Morgan S. Templeton

This notice was automatically generated by the Court's auto-notification system.

-

**The following people were served electronically:**

Virginia Watson Williams for Edwina C Fersner

David Reynolds Williams for Edwina C Fersner

**The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:**

Laquandra Sondreater Hamilton

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	:	FOR THE FIRST JUDICIAL CIRCUIT
COUNTY OF ORANGEBURG	)	CIVIL ACTION NO.: 2018-CP-38-01493
EDWINA C. FERSNER,	)	
	)	
Plaintiff,	)	<b>AMENDED NOTICE OF</b>
	)	<b>APPEARANCE AND CONDITIONAL</b>
vs.	)	<b>ANSWER OF AUTO-OWNERS</b>
	)	<b>COMPANY</b>
LAQUANDRA SONDREATER	)	
HAMILTON,	)	
	)	
Defendant.	)	

---

PLEASE TAKE NOTICE that the undersigned hereby appear on behalf of Auto-Owners Insurance Company ("Auto-Owners") in this action and further give notice that Auto-Owners will provide a defense to the alleged at-fault Defendant if necessary to protect Auto-Owners' interests under the terms and conditions of the policy issued by Auto-Owners to Make McRae, Jr. Auto-Owners specifically reserves and does not waive any and all terms and conditions of the policy. Auto-Owners specifically demands a trial by jury. The undersigned further state that they do not represent the Defendant but are specifically reserving the option to assume control of the defense in the name of the Defendant pursuant to the underinsured motorist statute.

This appearance is made pursuant to S.C. Code Ann. § 38-77-160. To the extent a responsive pleading is required, the allegations in the Complaint are denied. Auto-Owners further asserts the affirmative defenses set forth in Rule 8 of the South Carolina Rules of Civil Procedure and the defenses set forth in Rule 12 of the South Carolina Rules of Civil Procedure, all to the extent they are applicable.

The undersigned further reserves the right to file a full answer at such time as it may assume the defense in this matter or thereafter.

By filing this Notice of Appearance and Conditional Answer, Auto-Owners makes no representations or admissions as to the existence, applicability, or amount of any insurance coverage.

Dated this 17<sup>th</sup> day of December, 2018.

Respectfully submitted,

WALL TEMPLETON & HALDRUP, P.A.

s/ Morgan S. Templeton

Morgan S. Templeton (SC Bar #15456)

John J. Dodds, IV (SC Bar #102690)

145 King Street, Suite 300 (29401)

Post Office Box 1200

Charleston, South Carolina 29402

(843) 329-9500

Morgan.Templeton@walltempleton.com

John.Dodds@walltempleton.com

Attorneys for Auto-Owners Insurance  
Company

## Certificate of Electronic Notification

### Recipients

**Morgan Templeton** - Notification transmitted on 12-17-2018 12:08:41 PM.

**David Williams** - Notification transmitted on 12-17-2018 12:08:41 PM.

**Virginia Williams** - Notification transmitted on 12-17-2018 12:08:41 PM.

\*\*\*\*\* IMPORTANT NOTICE - READ THIS INFORMATION \*\*\*\*\*  
NOTICE OF ELECTRONIC FILING [NEF]

-

**A filing has been submitted to the court RE: 2018CP3801493**

<b>Official File Stamp:</b>	12-17-2018 12:08:26 PM
<b>Court:</b>	CIRCUIT COURT Common Pleas Orangeburg
<b>Case Caption:</b>	Edwina C Fersner VS Laquandra Sondreater Hamilton
<b>Document(s) Submitted:</b>	Answer/Amended Answer
<b>Filed by or on behalf of:</b>	Morgan S. Templeton

This notice was automatically generated by the Court's auto-notification system.

-

**The following people were served electronically:**

Morgan S. Templeton for Auto-Owners Insurance  
Company  
Virginia Watson Williams for Edwina C Fersner  
David Reynolds Williams for Edwina C Fersner

**The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:**

Laquandra Sondreater Hamilton



**S. C. DEPARTMENT OF  
MOTOR VEHICLES**

OFFICE OF GENERAL COUNSEL

P.O. Box 1498, Blythewood, S.C. 29016; (803) 896-9900, Fax: (803) 896-9901

December 12, 2018

USPS Tracking # 7005 1820 0002 8992 3578

Laquandra S. Hamilton  
9310 Springfield Gardens Drive, Apt. B  
Charlotte, NC 28227

**Re: *Edwina C. Fersner V. Laquandra S. Hamilton***  
**Case No 2018-CP-38-01493, DMV 18-582**

Dear Ms. Hamilton:

In accordance with the provisions of Section 15-9-350 of the Code of Laws of South Carolina (1976), this office has received the enclosed Summons and Complaint in the above-entitled action. Under South Carolina law, this has the same legal effect as if you had been served with these documents personally.

Section 15-9-350 of the 1976 Code of Laws of South Carolina, as amended, provides that:

"The acceptance by a nonresident of the rights and privileges conferred by the laws in force in this State permitting the operation of motor vehicles, as evidenced by the operation of a motor vehicle by such nonresident on the public highways, the streets of any incorporated municipality or the public roads of this State or anywhere within this State, or the operation by such nonresident of a motor vehicle on any such public highways, streets, or public roads or anywhere within this State other than as so permitted or regulated shall be deemed equivalent to the appointment by such nonresident of the Director of the Department of Motor Vehicles or of his successor in office to be his true and lawful attorney upon whom may be served all summons or other lawful process in any action or proceeding against him growing out of any accident or collision in which such nonresident may be involved by reason of the operation by him, for him or under his control or direction, express or implied, of a motor vehicle on such public highways, Streets, or public roads or anywhere within this State. Such acceptance or operation shall be a signification of his agreement that any such process against him shall be of the same legal force and validity as if served on him personally."

Sincerely,

A handwritten signature in black ink, appearing to read "Natasha D. Thomas".

Natasha Thomas, Paralegal

Office of General Counsel

For: Director, South Carolina Department of Motor Vehicles

Enclosure

cc: Virginia W. Williams, Esquire  
P.O. Box 1084  
Orangeburg, SC 29116

## Certificate of Electronic Notification

### Recipients

**Morgan Templeton** - Notification transmitted on 01-08-2019 11:41:33 AM.

**David Williams** - Notification transmitted on 01-08-2019 11:41:33 AM.

**Virginia Williams** - Notification transmitted on 01-08-2019 11:41:33 AM.



\*\*\*\*\* IMPORTANT NOTICE - READ THIS INFORMATION \*\*\*\*\*  
NOTICE OF ELECTRONIC FILING [NEF]

-

**A filing has been submitted to the court RE:** 2018CP3801493

**Official File Stamp:** 01-08-2019 11:41:21 AM

**Court:** CIRCUIT COURT

Common Pleas

Orangeburg

**Case Caption:** Edwina C Fersner VS Laquandra Sondreater  
Hamilton

**Document(s) Submitted:** Service/Affidavit Of Service

**Filed by or on behalf of:** David Reynolds Williams

This notice was automatically generated by the Court's auto-notification system.

-

**The following people were served electronically:**

Morgan S. Templeton for Auto-Owners Insurance  
Company

Virginia Watson Williams for Edwina C Fersner

David Reynolds Williams for Edwina C Fersner

**The following people have not been served electronically by the Court. Therefore, they must  
be served by traditional means:**

Laquandra Sondreater Hamilton



**S. C. DEPARTMENT OF  
MOTOR VEHICLES**

OFFICE OF GENERAL COUNSEL

P.O. Box 1498, Blythewood, S.C. 29016: (803) 896-9900, Fax: 896-9901

January 22, 2019

Virginia W. Williams, Esquire  
P.O. Box 1084  
Orangeburg, SC 29116

**Re: *Edwina C. Fersner V. Laquandra S. Hamilton***  
**Case No 2018-CP-38-01493, DMV 18-582**

Dear Ms. Williams:

The notice of service and copy of the Summons and Complaint in the above-referenced action were sent via certified mail on December 12, 2018 to Defendant Laquandra S. Hamilton and returned to this office marked "Return to Sender Temporary Away Unable to Forward" by the U.S. Postal Service.

In accordance with the provisions of Section 15-9-380 of the 1976 Code of Laws, as amended, I am today sending notice of service and a copy of the Summons and Complaint to Defendant Laquandra S. Hamilton by open mail. Enclosed are: (1) the original certified mail envelope (with the return receipt card), (2) a photocopy of the open mail envelope, and (3) the Affidavit of Mailing. These documents will be filed by you with the Clerk of Court.

If you have any questions, please contact me at 803-896-9900.

Sincerely,

Natasha Thomas, Paralegal Assistant

Office of General Counsel

For: Director, South Carolina Department of Motor Vehicles


Enc.

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF RICHLAND )

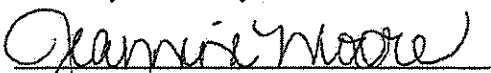
**AFFIDAVIT**

PERSONALLY appeared before me, Natasha Thomas, who, first being duly sworn, deposes and says that:

1. This Affidavit is made in compliance with Section 15-9-380 of the Code of Laws of South Carolina;
2. I am the designated representative of the Director of the South Carolina Department of Motor Vehicles;
3. On December 10, 2018, in accordance with the provisions of Sections 15-9-350 or 15-9-360 of the 1976 Code of Laws of South Carolina, the Summons and Complaint in an action styled *Edwina C. Fersner V. Laquandra S. Hamilton*, Case Number 2018-CP-38-01493, DMV 18-582 was received by the South Carolina Department of Motor Vehicles;
4. On December 12, 2018, a copy of the Summons and Complaint was sent to Laquandra S. Hamilton via certified mail at 9310 Springfield Gardens Drive, Apt. B Charlotte, NC 28227, which is the address furnished by Plaintiff's attorney.
5. On January 18, 2019, said copy of the Summons and Complaint was returned to the South Carolina Department of Motor Vehicles by the U.S. Postal Service marked "Return to Sender Temporary Away Unable to Forward," and is attached hereto; and
6. On January 22, 2019, a copy of the Summons and Complaint was sent to Laquandra S. Hamilton by open mail to the same address with sufficient postage attached thereto.

  
 Natasha Thomas, Paralegal Assistant  
 For: Director, S.C. Department of Motor Vehicles

Sworn to and subscribed before me this  
 22nd day of January, 2019

  
 Notary Public of South Carolina  
 My Commission Expires: May 28, 2024



South Carolina Department of Motor Vehicles  
P.O. Box 1498  
Blythewood, S.C. 29016

Form 103-A

Forwarding Service Requested

December 12, 2018

US

Laquandra S. Hamilton  
9310 Springfield Gardens Drive, Apt. B  
Charlotte, NC 28227

## Certificate of Electronic Notification

### Recipients

**Morgan Templeton** - Notification transmitted on 01-30-2019 03:35:04 PM.

**David Williams** - Notification transmitted on 01-30-2019 03:35:04 PM.

**John Dodds** - Notification transmitted on 01-30-2019 03:35:04 PM.

**Virginia Williams** - Notification transmitted on 01-30-2019 03:35:04 PM.

\*\*\*\*\* IMPORTANT NOTICE - READ THIS INFORMATION \*\*\*\*\*  
NOTICE OF ELECTRONIC FILING [NEF]

-

**A filing has been submitted to the court RE:** 2018CP3801493

**Official File Stamp:** 01-30-2019 03:34:44 PM

**Court:** CIRCUIT COURT

Common Pleas

Orangeburg

**Case Caption:** Edwina C Fersner VS Laquandra Sondreater  
Hamilton

**Document(s) Submitted:** Service/Affidavit Of Service

**Filed by or on behalf of:** Virginia Watson Williams

This notice was automatically generated by the Court's auto-notification system.

-

**The following people were served electronically:**

Morgan S. Templeton for Auto-Owners Insurance  
Company

Virginia Watson Williams for Edwina C Fersner

David Reynolds Williams for Edwina C Fersner

John Joseph Dodds, IV for Laquandra Sondreater  
Hamilton

**The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:**